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August 8, 2022

**VIA ECF AND EMAIL**

Hon. Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Request for Bail Modification as to Residence**  
*United States v. Eduar Vidal, 21 Cr. 726 (DLC)*

Dear Judge Cote:

As per an email from U.S. Pretrial Services Officer Jaime Stroup on Wednesday, August 3, 2022, Mr. Vidal and his wife are planning a move to 429 Susquehanna Blvd., Hazelton, Pennsylvania, which is in the Middle District of Pennsylvania. I have spoken to Mr. Vidal, and I write to explain the situation and request that Your Honor approve a bail modification that would permit Mr. Vidal relocate to the Middle District of Pennsylvania, which is where the new residence is located.

First, Mr. Vidal and his wife also have family in the Bronx, New York, which is where they stayed during the trial in this matter, and where they stay when a court date is scheduled, or if Mr. Vidal is required to attend a meeting at Pretrial Services. There is therefore no danger of his missing a court appearance or a meeting when required.

The house in Allentown, which is owned by Mr. Vidal and his wife, and which is where Pretrial Services was supervising him, is about to go into foreclosure because Mr. Vidal has been unable to work adequately to pay his mortgage since his arrest. He and his wife therefore need to move. Hazelton is a

less expensive location and they have found an apartment that meets their needs and is more affordable.

Mr. Vidal understands that he needs to comply with all his conditions of release, and that his compliance must continue for as long as he is at liberty. As he has been doing, when his presence is necessary in New York, he will travel to the Southern District the day before he is needed, so that he has no issues with travel on the day he must be here. I am confident that he will remain in compliance despite living in the Middle District of Pennsylvania.

I appreciate the Court's prompt consideration of this matter.

Sincerely,

*s/s Camille M. Abate, Esq.*

cc: AUSA T. Josiah Pertz (via ECF)  
AUSA Jonathan Bodansky (via ECF)

*Without objection from Probation  
Services, the request to change  
residence is granted.*

*Yours etc  
8/11/22*